

From: Anthony Gallegos
To: joelle
Date: 1/29/01 9:51AM
Subject: SF Phosphates M/047/007 - landfill permit

Joelle,

[Please insert a copy of this message into file M/047/007.]

This morning I spoke with Ralph Bohn of the Division of Solid and Hazardous Waste (801) 538-6170 regarding a Class IIb landfill application by SF Phosphates. The landfill is proposed to be located within the tailings area. Solid and Hazardous Waste require bonding for the landfill. The person in their agency reviewing the SF landfill permit is Roy Van Os.

I described the Division's bonding requirements and current bond review to Ralph. I estimated the time of our final approval of the bond could be 4 months from now. He described their requirements for the landfill permit and thought their approval for the landfill permit would be several months from now. Both of our permits require public notification and a public comment period.

Ralph believed we could avoid double bonding for the landfill by doing a couple of things, although one complication was their requirement for a 30-year post closure monitoring requirement in the bond. Ralph suggested the following to avoid double bonding:

- a) SF should include a specific line item for landfill reclamation costs in the reclamation estimate.
- b) DOGM correspondence regarding the bond review and inclusion of the landfill reclamation into the bond should be copied to Dennis R. Downs, Executive Secretary, Utah Solid and Hazardous Waste Control Board.
- c) DOGM's final approval letter should be copied to Dennis Downs.
- d) SF would need to post a bond with Solid and Hazardous for the 30-year post reclamation landfill monitoring prior to DOGM's final release of the reclamation bond. This could take place after the typical DOGM 3-year revegetation success monitoring, but prior to DOGM final release of the bond. This requirement will need to be mentioned in DOGM and Solid and Hazardous waste correspondence to SF.

thanks Joelle,

tony

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